



August 31, 2005

Tina M. Pidgeon
(202) 457-8812
tpidgeon@gci.com

EX PARTE – VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: WC Docket Nos. 04-36; 05-196
Notice of Oral Ex Parte Presentation

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this will provide notice that on August 29, 2005, Ron Duncan, Rick Hitz, Dana Tindall, Tina Pidgeon, Nan Thompson, and Lisa Youngers of GCI met with Monica Desai, Chief of the Consumer and Government Affairs Bureau; Tom Navin, Chief of the Wireline Competition Bureau; and Cathy Seidel, Acting Chief of the Wireless Bureau. During the meeting, the participants discussed the importance of ensuring interconnection rights for the exchange of IP-based traffic, number portability and access to numbers, competitively neutral universal service distribution policies for providers of IP-based services, and a clear intercarrier compensation framework in light of the jurisdictional nature of the service. Clarity with respect to these matters is especially critical for the benefit of consumers served by rural carriers, to ensure that new entrants are not deterred or precluded from delivering innovative services using new technologies.

In addition, the parties discussed the inherent technical difficulties in automatically capturing customer location data for certain nomadic IP-based services. While ensuring the delivery of calls to the appropriate PSAP for 911 calls made in Alaska would not seem to be an insurmountable issue (and indeed, would present an improvement to existing 911 service in some areas of Alaska), the issue of automatic user location appears to present technical difficulties in the case of nomadic handsets, including those that operate both in a standard wireless mode and in a "SIP" mode over a wireless broadband network. One possible approach, until a satisfactory technical

Ms. Marlene H. Dortch

August 31, 2005

Page 2 of 2

solution is found, would be to ensure that in the event an individual using such a device dialed 911, the PSAP operator would receive a prompt notifying that current location of the called must be confirmed, with the customer registered location serving as a default.

Please address any questions regarding the foregoing to the undersigned.

Sincerely,

/s/

Tina M. Pidgeon

Vice President, Federal Regulatory Affairs